

Name: Jesus Munguia  
Address: 6692 SOUTH MARSH ROCK RD WEST JORDAN UT 84081  
Telephone: 801 634 5881

FILED  
U.S. DISTRICT COURT

2015 AUG 31 A 10:55

DISTRICT OF UTAH

IN THE UNITED STATES DISTRICT COURT:  
DISTRICT OF UTAH - Central DIVISION DEPUTY CLERK

AUG 26 2015

U.S. DISTRICT COURT

Jesus Munguia

Plaintiff,

v.

Master Cleaning

Defendant(s).

COMPLAINT

Case: 2:15cv00608  
Assigned To : Waddoups, Clark  
Assign. Date : 8/26/2015  
Description: Munguia v. Master Cleaning

A. JURISDICTION

This action is brought pursuant to Title VII of the Civil Rights Act of 1964 as amended, for employment discrimination. Jurisdiction is specifically conferred on this Court by 42 U.S.C. § 2000e(5). Equitable and other relief are also sought under 42 U.S.C. § 2000e(5)(g). Jurisdiction is also based on 28 U.S.C. §§ 1331, 1343 and 42 U.S.C. §§ 1981 et seq. Where employment discrimination based upon age is alleged, jurisdiction is conferred by 29 U.S.C. §§ 626(c)(1) and appropriate relief is also sought.

B. PARTIES

1. Name of plaintiff:  
Present mailing address:

Jesus Munguia  
6692 SOUTH MARSH ROCK RD  
WEST JORDAN UT 84081

2. Name of first defendant:  
Present mailing address or  
business location:

Master Cleaning  
~~15 West Building 2~~ Activi NEYGOR  
1226 West South Jordan  
Parkway, Suite A-300  
South Jordan, Utah  
84095

3. Name of second defendant:  
Present mailing address or  
business location:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Name of third defendant:  
Present mailing address or  
business location:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(Use additional sheets if necessary.)

### C. NATURE OF CASE

1. The address at which I sought employment or was employed by the defendant(s) is:

Master Cleaning  
1226 West South Jordan  
Parkway, Suite A-300  
South Jordan, Utah

2. The discriminatory acts occurred on or about:

Work site: 15 West Building 2 84095  
Activi Neygor

02/1/2014  
(Month, Day, Year)

3. I filed charges with the Anti Discrimination Division of the Utah State Industrial  
Commission regarding the defendant's discriminatory conduct on or about:

- 08/26/15  
(Month, Day, Year)

4. I filed charges with the Equal Employment Opportunity Commission regarding the defendant's discriminatory conduct on or about:

05/30/14  
(Month, Day, Year)

5. The Equal Employment Opportunity Commission sent the attached "Notice of Right to Sue" which I received on:

08/1/2015  
(Month, Day, Year)

(Please attach the "Notice of Right to Sue" to this complaint.)

6. The discriminatory acts that are the basis of this suit are:

- a. \_\_\_\_\_ Failure to employ me
  - b. \_\_\_\_\_ Failure to promote me
  - c. yes Termination of my employment
  - d. \_\_\_\_\_ Demotion
  - e. yes Denied equal pay/work
  - f. \_\_\_\_\_ Sexual harassment
  - g. yes General harassment
  - h. \_\_\_\_\_ Other acts (Be specific: Attach an additional sheet if necessary)
- \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

7. Defendant's conduct is discriminatory with respect to:

- a. yes my race
- b. \_\_\_\_\_ my color
- c. yes my sex
- d. \_\_\_\_\_ my religion
- e. yes my national origin
- f. \_\_\_\_\_ my age

8. I believe that the defendant is still committing these acts against me.

  /   yes      \_\_\_\_\_ no

#### D. CAUSE OF ACTION

1. I allege that the defendant has discriminated against me and that the following facts form the

Harassment, name calling  
basis for my allegations: Termination of employment

- a. (1) Count I: Verbally abused me, discrimination  
for national origine, back pay issue with wage

(2) Supporting Facts: (Describe exactly what each defendant did or did not do.  
State the facts clearly, in your own words without citing any legal  
authority. Use additional sheets if necessary.)

The people from the building  
harassed me. The hours  
I was at work. (see other  
page.)

- b. (1) Count II: 1

(2) Supporting Facts:

---

---

---

---

---

---

#### E. INJURY

1. How have you been injured by the actions of the defendant(s)?

The result was of them  
firing me running me off.  
I couldn't pay my  
rent and the people at  
work possibly told  
other people on the

(see other  
page.)

#### F. REQUEST FOR RELIEF

2. I believe I am entitled to the following relief:

For the damages caused  
I ask for a pension  
reward off \$100,000  
for psychological damages  
that they caused and  
suffering.

V4) (2) Continued

They made fun of me,  
shouting harmful words  
~~obscene~~ all the time.  
About some supposed  
sexual videos and an  
internet page where  
supposed I am or my  
person is asking the  
Manager what happened.  
He said nothing happened.  
The Manager said I  
was crazy. That I  
was hearing things  
and I was probably  
on drugs. The situation  
got serious enough to  
the point that I  
considered or thought  
about committing suicide  
in the building. After that

I was terminated. This took place approximately 02/01/2014.

~~(b) (2)~~.

## Injury

1.)

Street about the internet page & videos. These other people continued to persecute and harass me. I was homeless for approx. one year. I was dismissed from three other companies because they said they had seen the video on the internet. I became very stressed and mentally effected.

**DECLARATION UNDER PENALTY OF PERJURY**

The undersigned declares under penalty of perjury that he/she is the plaintiff in the above action, that he/she has read the above complaint and that the information contained therein is true and correct.  
28 U.S.C. §1746; 18 U.S.C. § 1621.

Executed at \_\_\_\_\_ on 8/26/15, 19\_\_\_\_.  
(Location)

Jesus Mungura  
Signature

H:\prose\vii.gui